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November 3, 2023

Hon. Lewis J. Liman, U.S.D.J.
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007

Via ECF

Re: **689 Eatery Corp., etc. et ano. v. City of New York, et al.,**
Docket No. 02 CV 4431 (LJL) (“Action No. 1”)

59 Murray Enterprises, Inc. etc., et ano. v. City of New York, et al.,
Docket No. 02 CV 4432 (LJL) (“Action No. 2”)

Club at 60th Street, et al. v. City of New York
Docket No. 02 CV 8333 (LJL) (“Action No. 3”)

336 LLC, etc, et al. v. City of New York
Docket No. 18 CV 3732 (LJL) (“Action No. 4”)

Dear Judge Liman:

We represent the plaintiffs in Action No. 2, and on behalf of all counsel for all parties, are e-filing concurrently herewith a list of the parties' respective objections to the direct-testimony declarations previously identified by the parties.

The parties filed their joint list of exhibits on October 30. The parties had no objections other than relevance objections to any of the exhibits, and the City then separately filed its relevance objections to both the exhibits and the declarations. (Plaintiffs had no relevance objections.)

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The attached lists present the parties' objections only to the declarations and identify the declarant, the title of the document, the ECF number (hyperlinked to action no. 3), and the basis of the objections on a paragraph-by-paragraph basis.

Respectfully,

Edward S. Rudofsky
Edward S. Rudofsky

Cc: All Counsel (Via E-Filing)